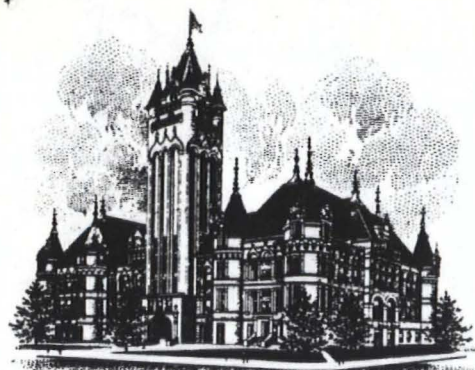


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JOHN R. McBRIDE  
First District

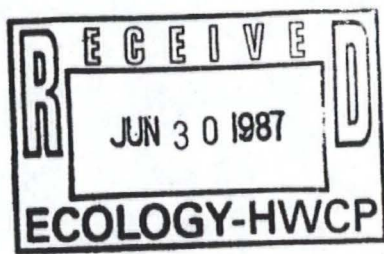
F. KEITH SHEPARD  
Second District

PATRICIA A. MUMMEY  
Third District

SPOKANE, WASHINGTON 99280-0100

June 29, 1987

Mr. Fred Gardner  
Washington State Department of Ecology  
Mail Stop PV-11  
Olympia, Washington 98504



Re: COLBERT LANDFILL FEASIBILITY STUDY COMMENTS

Dear Mr. Gardner:

This letter transmits the joint comments of Spokane County and Key Tronic Corporation to the request for comments by the Department of Ecology (DOE) on the Feasibility Study (FS) prepared for the Colbert Landfill by DOE's consultant. The comments include this letter, an identical letter from Key Tronic Corporation, the enclosed cover letter and technical comments of our consultant, Dames & Moore. These joint comments are submitted pursuant to DOE actions which extended the comment period until June 30, 1987. While the comments primarily address the FS, the interrelationship between that study, the Remedial Investigation (RI), and the Risk Assessment (RA) necessarily leads to some overlap and the joint comments may necessitate corrections or additions to any or all three of the studies.

As the owner/operator and user of the Colbert Landfill, Spokane County and Key Tronic Corporation have played a responsible and constructive role in addressing the problems created by the site. Among other things, we have promptly and vigorously supported and conducted investigations, assisted in the provision of an alternative water supply to homes potentially affected, and maintained regular communications with the Colbert and Spokane community residents who are interested in this problem.

The County and Key Tronic has sometimes been frustrated in these efforts. They, and other potentially responsible parties (PRPs) should have been, but were not, afforded an opportunity to conduct the RI/FS. Instead, the Department of Ecology insisted on using its own contractors. Despite the presence of responsible, viable PRPs, the RI/FS process that has resulted was not conducted in a manner conducive to PRP participation. Failure to involve PRPs in



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the RI/FS process and enable them to conduct the studies has led to unnecessary delays in addressing the cleanup problem. Originally scheduled for completion in November, 1986, the RI/FS was delayed numerous times and ultimately issued in May, 1987. Interested parties were initially given only 21 days to comment on this four-volume, highly technical document that is to serve as the basis for a multimillion-dollar remedial action potentially lasting many years. Indeed, comments were initially due two (2) weeks after DOE conducted a briefing of the PRPs on the entire FS and one week after briefing the public on the FS. The public and PRPs reacted with understandable dismay, which led to an extension until June 30, 1987.

We have assumed the comment period and other additions to the record will close on June 30, 1987. In the event that additional comments are received or the record is expanded after the period of June 30, 1987, Spokane County and Key Tronic reserve the right to respond.

Because of the limited participation allowed PRPs and the limited time provided for comment, the County and Key Tronic were unable to undertake as full and complete a review as would otherwise have been possible. The enclosed transmittal letter from Dames & Moore indicates some of the major questions which remain unresolved. Partly as a result of the unresolved questions and the likely prospect that new information, Spokane County and Key Tronic Corporation reserve the right in the future to take positions in addition or in the alternative to or inconsistent with those set forth in these comments. For example, the FS and our technical review indicate that the duration of pumping required to achieve determined cleanup levels cannot be specified in advance. We believe strongly that as a part of implementing remedial action, a process must be developed for specifying such duration and for identifying and using alternative technologies as new information develops.

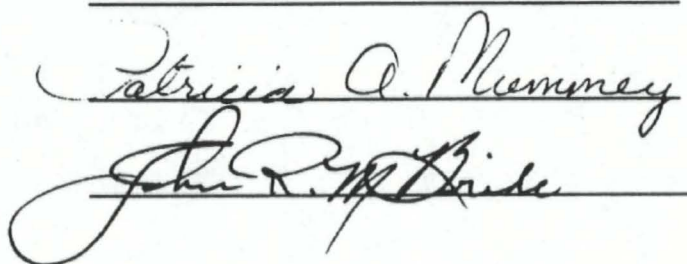
This said, on present information the County and Key Tronic have no serious disagreement with the preferred remedial action alternative recommended in the FS: Deep well extraction and air stripping of contaminants. As partly indicated in the enclosed technical comments, we believe that the details of remedial action should be developed through a phased approach so that parameters such as pumping rates and technical options such as artificial aquifer recharge, bioremediation, or others can be considered as appropriate.

Key Tronic and the County further request that the Department of Ecology and EPA promptly undertake efforts to identify other PRPs. The FS and the enclosed technical comments support the naming of Fairchild Air Force Base and further inquiry as to the identification of other PRPs. For example, the mass balance information developed in the FS demonstrates that Key Tronic and Fairchild alone do not account for the known alleged contaminants. There were other contributors. Better information about the other contributors can reduce uncertainty about the nature and extent of DNAPLs (secondary sources) and thus assist in the refinement of remedial action.

Spokane County and Key Tronic Corporation are prepared to continue to work with the DOE and EPA toward expeditious cleanup of the site. Accordingly, they jointly request the prompt initiation of discussions with the DOE and the EPA on agreed implementation of remedial action accompanied by the execution of appropriate legal documents as a consent decree.

We appreciate the opportunity to make these comments and look forward to early and positive discussions concerning implementation of remedial action.

BOARD OF COMMISSIONERS OF  
SPOKANE COUNTY, WASHINGTON



Two handwritten signatures are present, each on a horizontal line. The top signature is "Patricia A. Memmey" and the bottom signature is "John R. McDiade".

\* We do note one specific error in the RI. The reference to Bruce Austin on page i of the Remedial Investigation, Volume I, is incorrect. Mr. Austin was retained by both Spokane County and Key Tronic Corporation as is correctly noted in the FS, Vol. I, page ii.